

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

August 5, 1992

Diane M. Leber Ciba-Geigy Corporation 444 Saw Mill River Road Ardslev, New York 10502-2699

Ciba-Geigy Cranston Site (Stabilization Work Plan Outline)

Dear Ms. Leber:

I have reviewed the outline for the Stabilization Work Plan (SWP) submitted by you on June 17, 1992, and transmitted verbal comments to your consultant on July 9, 1992. The purpose of this letter is to approve the outline as being equivalent to the outline described in the "Draft Order Modification" dated July 31, 1992, as long as the following comments are incorporated into the outline:

- Should include a general discussion of the performance 1) standard(s) for each interim measure, a discussion of how more detailed performance standards will be developed, and a discussion of when and in what document more detailed performance standards will be submitted.
- Section 6 (project management): 2)

Should include a sub-section on Monthly Progress Reports and should have a sub-section on the final Stabilization Report (for each interim measure).

Should have more detail in the Schedule sub-section to reflect the items listed in the "Proposed Schedule" section of the Order Modification. If an item on the schedule does not have a specific date at the time of submittal of the SWP, then the SWP should identify when and in what document the specific date will be submitted.

Should include a "Confimatory Sampling Plan 3) (verification monitoring plan)" for each interim measure.





There should be a general discussion on how this plan will confirm that the performance standard(s) for each interim measure have or have not been met. There should be a discussion of when and in what document a more detailed plan will be submitted.

As long as you agree to address the above items in the Stabilization Work Plan and since the July 31, 1992 Draft Order Modification is close to being finalized, Ciba-Geigy may begin developing the Stabilization Work Plan.

If you have any questions, I can be reached at (617) 573-9643.

Sincerely,

Frank Battaglia, EPA Project Manager